

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	(ECF CASE)
DAVID PAKTER,	:	
	:	
Plaintiff,	:	08-cv-7673 (DAB)(KNF)
- against -	:	
	:	
NEW YORK CITY DEPARTMENT OF EDUCATION	:	
f/k/a BOARD OF EDUCATION OF THE CITY	:	
SCHOOL DISTRICT OF THE CITY OF NEW YORK;	:	
Et al,	:	NOTICE OF FILING
	:	Appendix - Section 2
Defendants.	:	
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Joy Hochstadt declares and says:

1. I am the Plaintiff's counsel in this matter.
2. With this Notice, I am providing the Court with an electronic copy of the Section 2 to the *"Appendix of Documents in Further Support of Allegations as Set Forth in the Amended Complaint"*.
3. The Appendix is being divided into Different Sections so that it can be uploaded and does not exceed the maximum allowed amount of 2.5 KB per attachment.
4. A courtesy hard copy and electronic disk are also being provided to the Hon. Deborah A. Batts, USDJ.

Dated: New York, New York
April 26, 2009

/s/ (electronic signature)
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SECTION 2 – Pages 150 – 200

(pages 197 – 200 reserved)

**What Motivated David Pakter & How His
Colleagues Praised Him !**

151 – 152	National Study Uncovers Public School Racial Discrimination <i>“The inequality is persistent and pervasive and amounts to a deep pattern of institutional racism in US public schools”</i> <i>... The gap in educational achievement represents a pattern of racial discrimination”</i> Pakter fights to give his students and minorities at his school equal educational opportunities and is praised for it – until 2003.
153 - 158	2003 Accolades from Defendant Principal Appell
159 – 160	2003 Accolades from Defendant Ass't Principal Geist Dennino
161 – 162	2000 Accolades from Defendant Ass't Principal Lachky
163 – 164	2000 Accolades from Defendant Ass't Principal Burack & 2001 from Principal Eisman
165 – 168	1997 - 1999 More Accolades from Defendant Ass't Principal Lachky
169 – 170	1996 Accolades from Principal Embriano
171 – 172	1996 Accolades from Principal Cagle
173	1996 Accolades from Outside Agency National Executive Service Corp
174 – 175	1995 – More Accolades from Principal Lachky

APPENDIX OF DOCUMENTS TO 1st AMENDED COMPLAINT– Page 3

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176	1995 – More Accolades from Principal Cagle
177 – 191	1991 - 1995 – More Accolades from Ass't Principal Lachky
192 – 196	1982 – 1990 – Misc. Accolades from Principals & Supervisors

Note: It was same Defendants (such as Appell, Lachky and Geist-Dennino) who praised Pakter from throughout the period from 1990s to 2003 but then based on events as described below in 2003 / 2004 started to later target Pakter including those who later targeted Pakter because, among other things,

- they viewed Pakter as a threat to their positions and “fiefdoms” within the NYC public school system,*
 - they viewed Pakter as a threat to the continued intentional discrimination against minority students (of color) that Pakter discovered within the NYC public school system (at least at his High School of Art & Design (“HS A&D”);*
 - They viewed Pakter as a threat who could expose the potentially criminal and/or negligent misdirection / misuse of dedicated educational funds for minority student programming at HS A&D;*
 - They viewed Pakter as a threat who could expose other discriminatory policies (against students and teachers) in the NYC public school; and*
 - Pakter’s exercise of his 1st Amendment rights to speak out against the policies he believed were discriminatory and in violation of students and his rights threatened their future and job security.*
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